SUSANA
MARTINEZ
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Lt. Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Harold Runnels Building
1190 South St. Francis Drive (87505)
P.O. Box 5469, Santa Fe, NM 87502-5469
Phone (505) 827-0187 Fax (505) 827-0160
www.env.nm.gov

BUTCH TONGATE
Cabinet Secretary

J. C. BORREGO
Deputy Secretary

Certified Mail – Return Receipt Requested

August 31, 2017

Ms. Mary Boroughs, President
Chevron Mining Incorporated (CMI)
6001 Bollinger Canyon Road
San Ramon, CA 94583

Re: Minor Individual Permit; SIC 1221; NPDES Compliance Evaluation Inspection; CMI / Ancho-Gachupin-Bracket Mine; NM0030180; July 19, 2017

Dear Ms. Boroughs:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Further explanations and problems noted during this inspection are discussed on the completed form and checklist of this inspection report. You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

David Long
NPDES Enforcement Coordinator
Environmental Protection Agency, Region 6
NPDES Enforcement Branch (6EN-WM)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Sarah Holcomb
Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Erin Trujillo at 505-827-0418 or at erin.trujillo@state.nm.us.

Sincerely,

/s/Sarah Holcomb

Sarah Holcomb
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
David Long, USEPA (6EN-WM) by e-mail
David Esparza, USEPA (6EN-WM) by e-mail
Amy Andrews, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WC) by e-mail
Brent Larsen and Tung Nguyen, USEPA (6WQ-PP) by e-mail
Isaac Chen, USEPA (6WQ-PP) by e-mail
Robert Italiano, NMED District II by e-mail
James R. Smith, P.E., Program Manager, Coal Mine Reclamation, MMD, EMNRD by e-mail
Ian Robb, Project Manager, Chevron Mining, Inc. by e-mail
Steve Linse, P.E., Project Manager, Trihydro by e-mail
Cameron Twing, P.E., Civil Engineer, Trihydro by e-mail

EPA

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	Transaction Code	2	NPDES	11	yr/mo/day	17	Inspec. Type	18	Inspector	19	Fac Type	20
	N	5	NM0003018	12	170719		C		S		2	

Remarks: BITUMINOUS COAL MINE

67	Inspection Work Days	69	70	Facility Evaluation Rating	71	BI	72	QA	73	74	75	Reserved	80
			2			N		N					

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*
Chevron Mining, Inc., York Canyon Mine Complex, Trihydro Raton Office, 216 Park Avenue, Raton, NM 87740. From I-25 at Raton to Ancho-Gachupin-Bracket (Acho) Mine at 3310 Hwy 555, Raton, NM, take Exit 450 at Raton, travel approximately 40 miles west to locked gate. Colfax County.

Entry Time /Date
0725 hours / 07/19/2017

Permit Effective Date
September 1, 2014

Exit Time/Date
1730 hours / 07/19/2017

Permit Expiration Date
August 31, 2019

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Steve Linse, P.E., Senior Mining Engineer and Project Manager, 1252 Commerce Drive, Laramie, Wyoming 82070 / 307-745-7474

Name, Address of Responsible Official/Title/Phone and Fax Number
Ms. Mary Boroughs, President, Chevron Mining Incorporated (CMI), 6001 Bollinger Canyon Road, San Ramon, CA 94583 / 925-842-2524, General Telephone 925-842-1000

Contacted: Yes [ ] No [*]

Other Facility Data

Mine Entrance Gate
Latitude: 36.874354°
Longitude: -104.920913°

SIC 1221

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

M	Permit	S	Flow Measurement	M	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	M	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
U	Effluent/Receiving Waters	U	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See attached report and further explanations. Findings of the York Canyon Mine Complex, York Mine (NPDES Permit No. NM0000205) and Ancho-Gachupin-Bracket (Ancho) Mines (NPDES permit No. NM0030180) are provided under a separate USEPA 3560 form, checklist and further explanations report.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Erin S. Trujillo */s/Erin S. Trujillo*	**NMED/SWQB/505-827-0418**	**08/31/2017**
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Jennifer Foote */s/Jennifer Foote*	**NMED/SWQB/505-827-0596**	**08/31/2017**

Chevron Mining, Inc. - Ancho-Gachupin-Bracket Mine - 07/19/2017	PERMIT NO. **NM0030180**

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS ☐ S ☒ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED* ***Yes***).
DETAILS: **See further explanations for other issues related to permit conditions.**

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE. **Address**	☐ Y ☒ N ☐ NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES.	☐ Y ☐ N ☒ NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT. **Location**	☐ Y ☒ N ☐ NA
4. ALL DISCHARGES ARE PERMITTED. **No discharges observed on day of CEI**	☒ Y ☐ N ☐ NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. ☐ S ☒ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED* ***Yes***).
DETAILS: **NetDMR subscriber agreement approved 01/20/2011. Reviewed DMRs since last CEI 7/22/2014 / Effective Date of Permit.**

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.	☒ Y ☐ N ☐ NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	☒ S ☐ M ☐ U ☐ NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING.	☒ Y ☐ N ☐ NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING.	☒ Y ☐ N ☐ NA
c) ANALYTICAL METHODS AND TECHNIQUES.	☒ Y ☐ N ☐ NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.	☒ Y ☐ N ☐ NA
e) DATES AND TIMES OF ANALYSES.	☒ Y ☐ N ☐ NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.	☒ Y ☐ N ☐ NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	☒ Y ☐ N ☐ NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.	☒ Y ☐ N ☐ NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	☐ Y ☐ N ☒ NA

SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. ☐ S ☒ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED* ***Yes***).
DETAILS: **Annual Sediment Control Plan Report lists major measures (approximate original contouring, impoundments, rock check dams, grass filters, and vegetation). Facility has maintenance list/map that includes items for repair, maintenance, etc. See further explanations and photo log for observations of monitoring equipment and sediment control plan inspections.**

1. TREATMENT UNITS PROPERLY OPERATED.	☒ S ☐ M ☐ U ☐ NA
2. TREATMENT UNITS PROPERLY MAINTAINED.	☒ S ☐ M ☐ U ☐ NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.	☐ S ☐ M ☐ U ☒ NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	☐ S ☐ M ☐ U ☒ NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE.	☒ S ☐ M ☐ U ☐ NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.	☐ S ☐ M ☐ U ☒ NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	☐ S ☐ M ☐ U ☒ NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.	☐ Y ☐ N ☒ NA
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. **Schedule not documented**	☐ Y ☒ N ☐ NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	☐ Y ☐ N ☒ NA

Chevron Mining, Inc. - Ancho-Gachupin-Bracket Mine - 07/19/2017	PERMIT NO. **NM0030180**

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?	☐ Y ☒ N ☐ NA
IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?	☐ Y ☐ N ☒ NA
HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	☐ Y ☐ N ☒ NA
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?	☐ Y ☐ N ☒ NA
IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	☐ Y ☐ N ☒ NA

SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. ☐ S ☒ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED **Yes**).*
DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	☒ Y ☐ N ☐ NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	☐ Y ☐ N ☒ NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT. **See further explanations - Section A**	☒ Y ☐ N ☐ NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE**. N = Not documented; See further explanations - Section F**	☐ Y ☒ N ☐ NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	☐ Y ☐ N ☒ NA
b) PROPER PRESERVATION TECHNIQUES USED.	☒ Y ☐ N ☐ NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	☒ Y ☐ N ☐ NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?	☐ Y ☐ N ☒ NA

SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED **No**).*
DETAILS: **Part I.A flow measurement type is "Estimate." See further explanations Section D and F for procedures for calculations.**

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE	☐ Y ☐ N ☒ NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	☒ Y ☐ N ☐ NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	☐ Y ☐ N ☒ NA
4. CALIBRATION FREQUENCY ADEQUATE.	☐ Y ☐ N ☒ NA
RECORDS MAINTAINED OF CALIBRATION PROCEDURES.	☐ Y ☐ N ☒ NA
CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.	☐ Y ☐ N ☒ NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.	☐ Y ☐ N ☒ NA
6. HEAD MEASURED AT PROPER LOCATION.	☐ Y ☐ N ☒ NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	☐ Y ☐ N ☒ NA

SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. ☐ S ☐ M ☒ U ☐ NA *(FURTHER EXPLANATION ATTACHED **Yes**).*
DETAILS: **Contracted / commercial laboratory not inspected during this CEI. See further explanations for written procedures.**

1. EPA APPROVED ANALYTICAL PROCEDURES USED *(40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES).* **Total Recoverable Aluminum**	☒ Y ☐ N ☐ NA

Chevron Mining, Inc. - Ancho-Gachupin-Bracket Mine - 07/19/2017	PERMIT NO. **NM0030180**

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED. ☐ Y ☐ N ☒ NA

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. ☐ S ☐ M ☐ U ☒ NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. **Updates needed for written procedures dated 06/05/2012** ☐ S ☐ M ☒ U ☐ NA

5. DUPLICATE SAMPLES ARE ANALYZED. **5** % OF THE TIME. ☒ Y ☐ N ☐ NA

6. SPIKED SAMPLES ARE ANALYZED. __ % OF THE TIME. ☐ Y ☐ N ☒ NA

7. COMMERCIAL LABORATORY USED. ☒ Y ☐ N ☐ NA

LAB NAME **TestAmerica Laboratories, Inc. (303-736-0100)**
LAB ADDRESS **4955 Yarrow Street, Arvada, CO 80002**
PARAMETERS PERFORMED **Total Recoverable Aluminum**

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. ☐ S ☐ M ☒ U ☐ NA *(FURTHER EXPLANATION ATTACHED **Yes**).*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
Various	**No Discharge**	**No Discharge**	**No Discharge**	**No Discharge**	**No Discharge**	**No Discharge**	**None**

RECEIVING WATER OBSERVATIONS: **See further explanations for effluent limitation exceedances.**

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ☐ S ☐ M ☐ U ☒ NA *(FURTHER EXPLANATION ATTACHED **No**.*
DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. ☐ S ☐ M ☐ U ☒ NA

2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. ☐ S ☐ M ☐ U ☒ NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: _____ (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES *(FURTHER EXPLANATION ATTACHED **No**).*

1. SAMPLES OBTAINED THIS INSPECTION. ☐ Y ☐ N ☒ NA

2. TYPE OF SAMPLE OBTAINED

GRAB _____ COMPOSITE SAMPLE ___ METHOD _____ FREQUENCY

3. SAMPLES PRESERVED. ☐ Y ☐ N ☒ NA

4. FLOW PROPORTIONED SAMPLES OBTAINED. ☐ Y ☐ N ☒ NA

5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. ☐ Y ☐ N ☒ NA

6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. ☐ Y ☐ N ☒ NA

7. SAMPLE SPLIT WITH PERMITTEE. ☐ Y ☐ N ☒ NA

8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. ☐ Y ☐ N ☒ NA

9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. ☐ Y ☐ N ☒ NA

Compliance Evaluation Inspection
Chevron Mining, Inc. / Ancho-Gachupin-Bracket Mines
NPDES Permit No. NM0030180
July 19, 2017

Further Explanations

Introduction

On July 19, 2017, Erin S. Trujillo of the State of New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Ancho-Gachupin-Bracket Mines owned by Chevron Mining, Inc. or CMI (formerly owned by Pittsburg & Midway Coal Mining Company) located approximately 40 miles west of Raton, New Mexico in Colfax County. Chevron Environmental Management Company (CEMC) manages operations at the York Canyon Complex. The facility has State of New Mexico Mining and Minerals Division (MMD) permits for Ancho Mine and Gachupin-Bracket Mines.

Ancho Mine, et. al., is classified as a minor discharger under the federal Clean Water Act, Section 402 National Pollutant Discharge Elimination System (NPDES) permit program and is assigned permit number NM0030180. This permit authorizes mine drainage discharge due to precipitation events from reclamation areas at 22 Outfalls (004-007, 011-012, 014-023, 030-034, and 037) to Salyers Canyon, Ancho Canyon, Gachupin Canyon, Bracket Canyon, and unnamed tributaries to Vermejo River, thence to the Canadian River in Segment 20.6.4.309 New Mexico Administrative Code (NMAC) of the Canadian River Basin.

Perennial reaches of waters in 20.6.4.309 NMAC have the following designated uses: domestic water supply, irrigation, high quality coldwater aquatic life, livestock watering, wildlife habitat, and primary contact. The use-specific numeric criteria set forth in 20.6.4.900 NMAC are applicable to the designated uses, except that the following segment-specific criteria apply: specific conductance 500 µS/cm or less; the monthly geometric mean of E. coli bacteria 126 cfu/100 mL or less, single sample 235 cfu/100 mL or less. Vermejo River, from York Canyon to headwaters (Assessment Unit NM-2305.A_230) is listed for Benthic-Macroinvertebrate Bioassessments and Temperature and from Rail Canyon to York Canyon (Assessment Unit NM-2305.A_220) is listed for specific conductance and temperature (Source: 2016 State of New Mexico §303(d) List of Impaired Surface Waters). A Total Maximum Daily Load (TMDL) was USEPA-approved on September 21, 2017 and is available at https://www.env.nm.gov/swqb/Canadian/index.html). Assessment of data from the NMED SWQB 2016 Canadian River Watershed survey has not been completed.

Portions of Gachupin Canyon, Bracket Canyon and an unnamed tributary to Brackett Canyon are in Segment 20.6.4.97 (Ephemeral Waters) NMAC of the Canadian River Basin and described as follows: Gachupin Canyon from the Vermejo River upstream 2.9 miles to an unnamed west tributary near the Ancho mine outfall; Bracket Canyon upstream of the Vermejo River; and an unnamed tributary from Bracket Canyon upstream 2 miles to the Ancho mine [New Mexico, Water Quality Control Commission (WQCC) Approved Water Quality Standards (WQS) 2017]. Waters in 20.6.4.97 NMAC have the following designated uses: livestock watering, wildlife habitat, limited aquatic life and secondary contact.

Inspection Details

Mr. Steve Linse, P.E., Senior Mining Engineer and Project Manager, Trihydro Corporation, Laramie, Wyoming was contacted prior this inspection to arrange access. Trihydro Corporation is the reclamation and operational contractor for CMI at the York Canyon Complex. An entrance interview was conducted with Mr. Linse at the Trihydro Office, 216 Park Avenue, Raton, New Mexico upon arrival at approximately 0725 hours on the day of this inspection. The inspector made introductions, presented credentials and discussed the purpose of the inspection. Ms. Trujillo and Mr. Linse traveled to the York Canyon Complex and conducted a tour of both the CMI York Canyon Mine and the Ancho-Gachupin-Bracket (Ancho) Mine. Following the tour and returning to the Raton Office, recordkeeping was reviewed on-site or requested if not readily available. An exit interview was conducted with Mr. Linse at the Trihydro Corporation Raton

Office. The inspector left Trihydro Corporation, Inc. Raton Office at approximately 1730 hours on the day of the inspection. A summary of findings of this CEI were discussed with Mr. Ian Robb, Project Manager, CEMC; Ms. Michelle L. Bacon, Senior Counsel, Environmental & Safety Law Group, CMI; and Trihydro Corporation staff on August 28, 2017.

NMED performs a certain number of CEIs for the U.S. Environmental Protection Agency (USEPA) each year. The purpose of this inspection is to provide USEPA with information to evaluate the permittee's compliance with their NPDES permit. This report is based on review of files maintained by the permittee and NMED, on-site observation by NMED personnel, and information provided by the permittee's representatives. A draft site map provided by Trihydro Corporation following this CEI showing outfall locations is provided in Appendix A. Findings of the York Canyon Mine CEI, USEPA Permit No. NM0000205 are provided under a separate USEPA 3560 form, checklist and further explanations report.

Treatment Scheme / Western Alkaline Coal Mining Operations

Ancho Mine, et. al., are inactive coal mining facilities or operations that still have active mining activity for reclamation. There is no active disturbance for the removal of overburden or coal. Areas of the mines have received Phase II Bond Release. Once areas receive Phase III Bond Release would no longer be subject to the NPDES permitting program.

The property owner maintains access for ranch operations, coal bed methane development, logging, hunting, and other activities. The facility has no domestic sewage disposal according to the on-site representative. The facility has portable toilets and is not connected to a domestic or sanitary sewer treatment system. If needed, collected water from impoundments is used for re-vegetation/re-seeding operations.

As described in CMI renewal application map dated December 2013, impoundments were constructed above Ancho Canyon Outfalls 004, 005, 006, 007, 011, 012, 014, 015, 017, 018, and 031; and Gachupin-Brackett Canyon Outfalls 014, 015, 017, 018, and 031. Removal of berms for temporary impoundments has started. CMI renewal application map indicates that other, or combination of other types control measures, were constructed at other outfalls--rock check dam and sediment fence at Outfall 016; rock check dams at Outfalls 019, 020, 021, 030, 032, 033, 034, and 037; and sediment fence and grass filter at Outfalls 022 and 023.

Requirements in 40 Code of Federal Register (CFR) 434, Subpart H, apply to drainage at western alkaline coal mining operations from reclamation areas, brushing and grubbing areas, topsoil stockpiling areas, and regraded areas. Part II of the permit requires a site-specific Sediment Control Plan (SCP). The SCP was submitted to USEPA on September 11, 2009 (Source: CEMC Annual Sediment Control Plan Report dated October 25, 2016). Per conditions in Part II of the permit, operator must submit an annual Sediment Control Report (SCR) and conduct quarterly inspections. Annual SCRs indicate the following major sediment control measures, or best management practices: approximate original contouring, sediment control impoundments, rock check dams, grass filters, and vegetation. For Ancho Mine, et. al., the reporting period for the annual SCR have been from October 1st thru September 20th.

CMI did not update a Stormwater Pollution Prevention Plan (SWPPP) and did not submit a Notice of Intent (NOI) to obtain permit coverage for industrial stormwater discharges for the facility under the 2015 USEPA Multi-Sector General Permit (MSGP). The following are NPDES tracking identifications for past MSGP coverage for the York Canyon Complex:

Tracking	Submittal	Operator	MSGP
NMR05A757	01/05/2001	Pittsburg & Midway Coal	2000 MSGP
NMR05A064	07/31/2005	Pittsburg & Midway Coal	2005 MSGP
NMR05GE82	01/27/2009	Chevron Mining Inc.	2008 MSGP

Section A - Permit Verification - Overall rating of "Marginal"
Section B - Reporting and Recordkeeping - Overall rating of "Marginal"

Permit Requirements

- Part I.A.1 (Limitations and Monitoring Requirements) of the Permit requires monitoring for Total Recoverable Aluminum 1/month by a sample type of grab. Part III.C.5.a (Monitoring Procedures) states "*Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit or approved by the Regional Administrator."* Approved methods in 40 CFR 136.3 Table IB Note 4 state "*For the determination of total metals (which are equivalent to total recoverable metals) the sample is not filtered before processing."*

- Part III.D.9 (Standard Conditions, Reporting Requirements, Other Information) of the Permit states "*Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information."*

- Part I.C (Copy of Reports and Application to NMED) states *"The permittee shall send a copy of…all other reports required in the permit…to New Mexico Environment Department at the mailing addressed listed in Part III of the permit."* Part III.D.4 (Reporting Requirements) of the Permit states *"Duplicate copies of …all other reports shall be submitted to the appropriate State agency…."* The specific address is provided in Part III.D.4.

- Part III.D.11.b (Reporting Requirements) of the Permit states

  ALL REPORTS required by the permit and other information requested by the Director shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if: (1) The authorization is made in writing by a person described above; (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a-well or a well field, superintendent, or position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. A duly authorized representative may thus be either a named individual or an individual occupying a named position; and, (3) The written authorization is submitted to the Director.

- Part III.D.11.c (Certification) of the Permit states *"Any person signing a document under this section shall make the following certification…."* Specific language for the certification is provided in Part III.D.11.c.

Findings

Aluminum

- Total Recoverable Aluminum sample collection, recordkeeping and/or reporting requirements are not defined and/or further conditioned in the Permit. The Permit does not specify filtration requirements, in this case when the samples are turbid.

- CEMC's letter dated February 16, 2017 to the USEPA Permit Writer described that CMI conducted an aluminum pre-filtration study and attached NMED's input dated January 30, 2017. According to permittee representatives, filtration using a 1.0 µm filter has been used for reported aluminum results starting in 2017. NMED files do not include a response from USEPA R6 approving the 1.0 µm filter size.

Additional Information: Effective when the Permit was authorized, New Mexico Water Quality Standards approved by USEPA [2013] state *"For aluminum, the criteria are based on analysis of total recoverable aluminum in a sample that is filtered to minimize mineral phases as specified by the department."* Current NMED Standard Operating Procedures, NPDES Wastewater Sampling 8.3, Section 6.1.4 Total Recoverable Aluminum state "*If turbidity is 30 NTUs or less, follow the instructions for total metals samples…. If turbidity is greater than 30 NTUs, follow the instructions for dissolved metals samples…, but use a 10-µm filter in place of the 0.45-µm filter. If there are equipment problems prohibiting the measurement of turbidity in the field and the wastewater sample has any cloudiness as determined by visual inspection, then the total recoverable Al sample should be filtered using a 10-µm filter. Acidify with two, 2.5 mL aliquots of concentrated nitric acid. Keep samples at ambient temperature*." Samples from waters with turbidity greater than 30 NTU must be filtered with 10-µm disposable in-line capsule filters (rather than paper filters that are designed for use in plate or funnel-type filter holders) prior to analysis in order to determine impairment (Source: NMED Procedures for Assessing Water Quality Standards Attainment, Comprehensive Assessment and Listing Methodology (CALM) dated June 14, 2017).

Excerpts from NMED's letter dated January 30, 2017 regarding CEI/Chevron Mines, Inc. Revised Aluminum Pre-Filtration Study Report for NPDES Permit NM0030190 state:

> *The Department encourages CMI/GEI to continue attempts to adequately capture, characterize, and test non-impounded storm flow in support of a filterable (1.0 µm) aluminum implementation, and for reasons of discharge permit compliance testing.*
>
> *The Department concludes…the 1.0 µm filter size would allow passage of both dissolved and colloidal (0.001 to 1.0 µm range)… Al associated with the toxic fraction is supportable for compliance testing with appropriate attention to the problems associated with processing turbid, high volume sampling.*
>
> *…CMI/GEI should provide the revised report to EPA Region 6 for review as EPA is the NPDES permitting authority.*

Potential Unpermitted Industrial Stormwater Discharge

- It is not documented, as part of this permit, that potential unpermitted industrial stormwater discharges from access roads or other areas of the facility do not require NPDES permit coverage (see 40 CFR § 122.26 (14)). Access roads within the mine boundaries to reclamation areas are shared by the private land owners or other activities. Shared access roads within the mine boundaries cross receiving waters. Evidence of stormwater flow at a previous haul road that now provides shared access to reclamation areas (See Photo #1) was toward a rock ditch that enters a swale below the Outfall 004 monitoring location described by the on-site representative. Not all stormwater flow from shared access roads within the mine boundaries would be monitored by permitted outfalls under NPDES Individual Permit NM0030180. A review of additional information that is not required under Individual Permit NM00030180 may be needed (e.g., MMD permit details, drainage conveyance locations, access road delineation within the mine boundaries, materials used in constructing roads, reclamation boundaries, etc.).

- Trihydro's memo referring to confidential information dated April 28, 2016 is provided in Appendix B. Permittee representatives described that the decision to not obtain permit coverage under the USEPA MSGP was based on conversations with USEPA headquarters. Further clarification and follow up with USEPA R6 Permit and Compliance & Enforcement Sections is recommended.

DMRs

- The Permit does not have conditions or definitions for reporting NODI codes. For Outfall 012A, the Permittee reported "NODI=B" or "No Discharge - Below Detection Limit/No Detection" for Total Recoverable Aluminum results for January 2016 and February 2016 in USEPA's NetDMR. The Permittee may contact the USEPA R6 Permit Writer, USEPA R6 Compliance/Enforcement Staff and/or NetDMR staff to confirm reporting definitions and requirements.

Signature Authority and Certification

- The corporate official and mailing address of the permittee has changed. NMED SWQB files do not include notice to USEPA with copy to NMED of the corporate official and address change and effective date.

  NMED SWQB files also do not include a copy of a current written authorization from a corporate official for a duly authorized representative to sign reports.

  Reports (e.g., Annual SCR) do not have certification language.

  Additional Information/Comment: The Permittee may contact USEPA for more information on whether a corporate official of CMI can delegate to individuals or positions in CEMC or contractors. The Permittee may contact USEPA NetDMR staff for more information on requirements to update authorizations to submit electronic DMRs. USEPA NetDMR support portal is located at https://netdmr.zendesk.com/hc/en-us.

Copies to the State

- Reviewed reports, in this case emails regarding 24-hour non-compliance, do not document that they are being copied to the current "Program Manager" at the state address listed in Part III of the permit. Cover letter/reports/e-mail cc's need to be updated.

Section C - O&M - Overall rating of "Marginal"

Permit Requirements

- Part II.A(B) of the Permit states "*The Sediment Control Plan must identify best management practices (BMPs) and also must describe design specifications, construction specifications, maintenance schedules, criteria for inspection, as well as expected performance and longevity of the best management practices.*"

  Part II.A (5) of the Permit States "*The permittee shall conduct reclamation inspections within the drainage areas associated with the outfalls list above in conjunction with vegetation and erosion studies no less than once/quarter. Inspection reports for each associated outfall shall be submitted with the annual Sediment Control Report as described in item (4) above. Each reclamation inspection report shall include, at a minimum, the following items: (i) The personnel who conduct the inspections. (ii) Date(s) on which inspection was performed. (iii) A written summary of major observations, including observation of no deficiency. (iv) Actions should be taken to correct noted deficiencies. (v) Photodocumentation of findings if necessary. (vi) The signature of delegated officer.*"

- Part III.A.7 (Duty to Provide Information) states "*The permittee shall furnish…within a reasonable time, any information …to determine compliance with this permit.*"

- Part III.C.1 (Monitoring and Records, Inspection and Entry) states *"The permittee shall allow…an authorized representative, upon the presentation of credentials …Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit."*

- Part III.B.3.b (Proper Operation and Maintenance) states:

  The permittee shall provide an adequate operating staff which is duly qualified to carry out operation, maintenance and testing functions required to insure compliance with the conditions of this permit.

Findings

- CMI no longer conducts inspections per Part II.A(5) of the Permit.

  Additional Information: CEMC October 25, 2016 annual SCR (Appendix C) states "*Vegetation monitoring performed in 2016 showed that total plant cover and total ground cover were above the technical standard set by the MMD."* and "*Quarterly reclamation inspection reports, as required by Part II.A(5) of the Permit, were discontinued in July 2015…."* NMED files do not include approval and/or concurrence from USEPA Region 6 that inspections may be eliminated.

- A review of monitoring equipment effectiveness appears needed. Maintenance, repair or alternative sample collection appears needed at Outfall 022 (see Photos #2 and #3).

Comment

- Records and written procedures were not readily available or located by the on-site representative on the day of this CEI which may indicate that an inadequate staff, cross-training or access to a recordkeeping system is being provided on-site to ensure compliance with the permit during periods of staff leave or other absence.

Section D - Self-Monitoring - Overall rating of "Marginal" and
Section F - Laboratory - Overall rating of "Unsatisfactory"
Section G - Effluent / Receiving Water - Overall rating of "Unsatisfactory"

Permit Requirements

- Part I.A.1 (Limitations and Monitoring Requirements) of the Permit requires a Total Recoverable Aluminum effluent limitation of 5.423 mg/L.

- Part III.C.5a (Standard Conditions, Monitoring Procedures) of the Permit states:

  Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit or approved by the Regional Administrator.

- Part III.C.5c (Standard Conditions, Monitoring Procedures) of the permit states:

  An adequate analytical quality control program, including the analyses of sufficient standards, spikes, and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.

- Part III.B.3a (Proper Operation and Maintenance) states:

  Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures.

Findings

Reported Exceedance for Total Recoverable Aluminum

- Reported exceedances of Total Recoverable Aluminum effluent limitations since the effective date of the current Permit are provided in Appendix D. Since changing the filter size in 2017, one exceedance has been reported for Outfall 032 (180 mg/L) in June 2017.

Written Monitoring Procedures/Analytical Quality Control Program

- Written monitoring procedures were inconsistent with reviewed recordkeeping; and did not list, describe or document use of approved methods in 40 CFR 136.3.

  Additional Information: It appeared that portions of the written Trihydro Corporation Water Monitoring Procedures for York Canyon Complex were updated since the previous CEI. The date of the written procedures, in this case June 5, 2012, should be checked. The following is a summary of procedure and/or update issues:

  - copies of previous permits have not been updated or replaced with current permits
  - procedures did not document equations and recordkeeping for flow estimate when depth of flow technique is used
  - procedures did not document that containers, preservation techniques, and holding times were approved in 40 CFR 136.3 Table II
  - procedures described plans to obtain duplicate and spike samples (e.g., one for each sampling batch of 20 samples or less) or 5 percent of the time. According to USEPA's NPDES Inspection Manual, *"10 percent of the samples should be duplicated."* Written procedures did not document reasons why the control sample frequency was adequate.

- Written monitoring procedures were also not updated with changed sample collection procedures (filter size) for Total Recoverable Aluminum.

- Written procedures did not address problems associated with processing turbid, high volume sampling noted in previously discussed NMED's letter dated January 30, 2017.

  Additional Information: Comments on the June 2017 DMR for Outfall 032 state *"Chevron suspects either lab error or filter breach caused this result. Upon receiving the sample result Chevron filtered and analyzed some excess sample volume to test this suspicion and the results were below effluent limits. Chevron is evaluating possible changes to our sample procedure to correct any potential sampling/filter problems."*

NMED/SWQB Official Photograph Log Photo # 1		
Photographer: Erin S. Trujillo	Date: 07/19/2017	Time: 1006 hours
City/County: Approximately 40 miles west of Raton / Colfax County		State: New Mexico
Location: Chevron Mining, Inc., Ancho Mine, et. al, NM0030180, South of Outfall 004		
Subject: South of the monitoring location for Outfall 004, looking generally east from an access road toward a reclamation area in the background of the photo. Photo shows wet soils and shallow erosion features (rills and sheetflow) from the location of a former haul road that is now a shared access road according to the on-site representative. Coal was observed on the access road. There was no observed discharge from the access road to a rock lined conveyance below the monitoring location for Outfall 004 on the day of this CEI. Arrow points to a diversion ditch that is intended to direct or convey runoff from the reclamation area to the pond associated with Outfall 004. No recent evidence of flow from the diversion ditch onto the access road was observed on the day of this CEI.		

NMED/SWQB Official Photograph Log Photo # 2		
Photographer: Erin S. Trujillo	Date: 07/19/2017	Time: 1215 hours
City/County: Approximately 40 miles west of Raton / Colfax County		State: New Mexico
Location: Chevron Mining, Inc., Ancho Mine, et. al, NM0030180, Monitoring Location for Outfall 002		
Subject: Sample collection box is not flush with the ground surface. It was not apparent that sufficient flow in the shallow channel would enter the box.		

NMED/SWQB Official Photograph Log Photo # 3		
Photographer: Erin S. Trujillo	Date: 07/19/2017	Time: 1215 hours
City/County: Approximately 40 miles west of Raton / Colfax County		State: New Mexico
Location: Chevron Mining, Inc., Ancho Mine, et. al, NM0030180, Monitoring Location for Outfall 022		
Subject: Straw wattle above the sample collection box shown in the previous photo had accumulated sediment. Purpose of the straw wattle or how the measure may direct flow into the sample collection box was not apparent.		

Attachment A

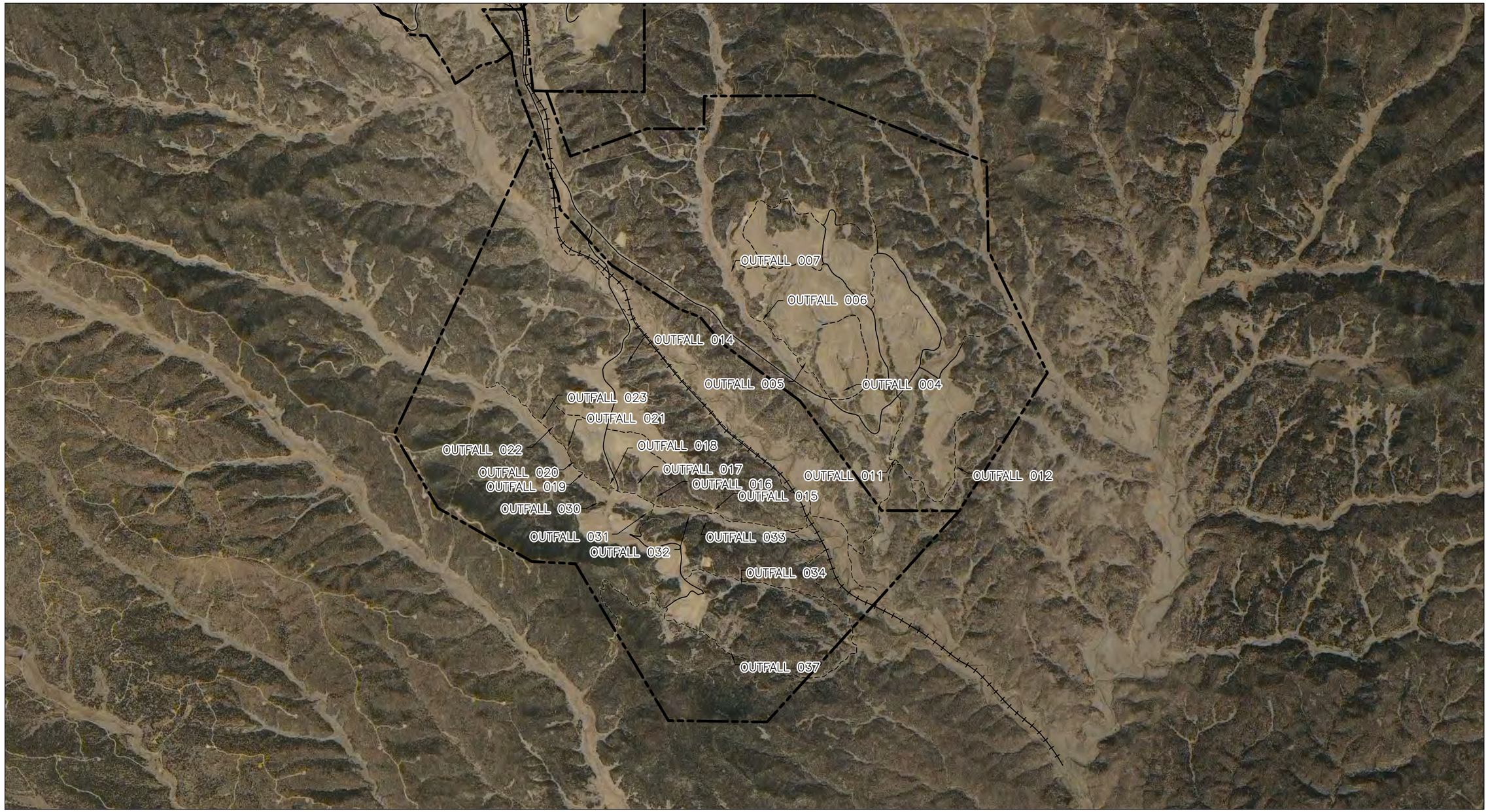

Image Cite: USDA–FSA–APFO Digital Ortho mosaic NAIP, Publication: 2012

EXPLANATION

- RAILROAD
- DIRT/GRAVEL ROAD
- PERMANENT ROAD
- PERMIT BOUNDARY
- STATE HIGHWAY 555

N

0 5,000'

Trihydro CORPORATION
1252 Commerce Drive
Laramie, Wyoming 82070
www.trihydro.com
(P) 307/745.7474 (F) 307/745.7729

SHEET 2

ANCHO-GACHUPIN-BRACKETT NPDES PERMIT NM0030180
OUTFALL LOCATIONS

YORK CANYON COMPLEX
RATON, NEW MEXICO

DRAFT

Drawn By: KW	Checked By: CT	Scale: 1" = 5,000'	Date: 8/4/17	File: 476_YCC_GENERAL_08[illegible]7

Attachment B

memorandum

To:	York Canyon File, Raton, New Mexico
From:	Cameron Twing, Trihydro Corporation
cc:	Ian Robb, Chevron; Steve Linse, Trihydro Corporation
Date:	April 28, 2016
Re:	York Canyon Complex, 2015 Industrial MSGP Variance

The following discussion is provided in reference to the United States Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP) issued June 4, 2015.

York Canyon Complex, 2015 Industrial MSGP Variance

Chevron Mining Inc., who permits the York Canyon Complex mines, and Chevron Environmental Management Company, who manages operations at the York Canyon Complex, have conducted a legal review of the MSGP and have issued a confidential Memo-to-File detailing the reasons why the York Canyon Complex is not required under the MSGP.

Instructions to Business Partners, Contractors, or Subcontractors at the York Canyon Complex

All questions or concerns regarding coverage under the MSGP for the York Canyon Complex should be directed to the Chevron Environmental Management Company Project Manager or Chevron Law Department.

Ian Robb
Project Manager
Mining and Specialty Portfolios
Chevron Environmental Management Company
6101 Bollinger Canyon Road, Room 5390
San Ramon, CA 94583
Tel 925 790 6513
Cell 925 549 1182
ianrobb@chevron.com

Michelle L. Bacon
Senior Counsel, Environmental & Safety Law Group
Chevron Law Department
Chevron Corporation
6001 Bollinger Canyon Road (T/2192)
San Ramon, CA 94583
Tel 925 842 8807
Fax 925 842 8595
Cell 925 548 6646
michellebacon@chevron.com

Attachment C

Ian Robb
Project Manager
Chevron Environmental Management Company

October 25, 2016

Ms. Gladys Gooden-Jackson (6EN)
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

RE: NPDES Permit No. NM0030180
Annual Sediment Control Plan Report for the Period of
October 1, 2015 through September 30, 2016

Dear Ms. Gooden-Jackson:

On behalf of Chevron Mining Inc. (CMI), Chevron Environmental Management Company (CEMC) hereby submits the Sediment Control Plan Annual Report for the Ancho-Gachupin-Brackett (Ancho) NPDES permit (NM0030180). This submittal is in fulfillment of the above mentioned permit, Part II.A – Sediment Control Plan.

Introduction

The York Canyon Complex is located approximately 40 miles west of Raton, New Mexico and includes the York Canyon Surface Mine, York Canyon Underground Mine, and the Ancho Surface and Gachupin-Brackett Mines. However, this report only covers the Ancho Surface and Gachupin-Brackett Mines as required by the NPDES permit referenced above. The NPDES permit became effective September 1, 2014; however, the Sediment Control Plan (SCP) for Ancho was submitted to the U.S. Environmental Protection Agency (EPA) Region 6 on September 11, 2009. No changes have been made to the Ancho SCP or Surface Mining Reclamation Act (SMCRA) permit administered by the New Mexico Mining and Minerals Division (MMD) since the previous permit term; therefore, an updated SCP has not been submitted per Part II.A(2) of the current permit.

Sediment Control Plan Summary

The SCP for Ancho identified three major sediment control measures, or best management practices (BMPs):

- Approximate original contouring,
- Treatment methods including sediment control impoundments, rock check dams, grass filters, and,
- Vegetation.

Ian Robb
Chevron Environmental Management Company
Mining and Specialty Portfolios
6001 Bollinger Canyon Road, San Ramon, CA 94583
Tel 925-842-3919 ianrobb@chevron.com

Approximate original contour and revegetation details are provided in Chapter 23 of the Ancho MMD permit 2012-02 and Section 906 of Gachupin-Brackett MMD Permit 2012-02. Design specifications, construction specifications, maintenance schedules, criteria for inspections, and expected performance and longevity for treatment BMPs mentioned above are provided in Chapter 26 of the Ancho MMD Permit 2012-02 and Appendix 909(A)(1)(ii) of Gachupin-Brackett MMD Permit 2012-02. The MMD permit uses watershed modeling to demonstrate that BMPs adequately reduce average annual sediment yields below pre-mined, undisturbed conditions. Watershed models are provided in Appendix 26.1-A of the Ancho MMD Permit 2012-02 and Appendix 909(A)(1)(ii) Supplement 1 and Supplement 2 of the Gachupin-Brackett MMD Permit 2012-02.

Evaluation of Sediment Control Measures

To conserve moisture, ensure stability, and control erosion on final graded slopes, either level or draining terraces have been constructed. Widths of the individual level or draining terrace benches are typically between 20 and 25 feet but do not exceed 25 feet, unless previously approved by the MMD. The vertical distance between level terraces on a 3h:1v slope do not exceed 33 feet. It should be noted that as slopes become less steep, the slope distance between level terraces increase, even though the vertical distance between terraces remains constant. Outslopes of both terrace types have a maximum slope of 3h:1v. Terrace cross-section design was based on the runoff predicted from a 10-year, 24-hour precipitation event. Terraces are repaired throughout the year to meet the intended purpose of the structures.

Surface runoff and sediment from disturbed areas are primarily controlled using sediment control impoundments. The impoundments are constructed and designed to effectively treat or contain runoff from disturbed areas. Sediment from smaller watershed areas and small areas of disturbance in the watershed from mining activities are controlled with other BMPs, e.g. grass filters and rock check dams. Impoundments and BMPs were inspected in June 2016 for stability.

All areas of the mine have been seeded in accordance with the vegetation plan in the approved MMD permit documents. The vegetation plan was designed to establish native communities capable of self-regeneration and successional development over time. This plan provides habitat for wildlife and stabilizes erosion from reclaimed areas. Vegetation monitoring performed in August 2016 showed that total plant cover and total ground cover were above the technical standard set by the MMD.

Quarterly Reclamation Inspection Reports

Quarterly reclamation inspection reports, as required by Part II.A(5) of the NPDES permit, were discontinued in July 2015 for the reasons discussed below.

MMD Sediment Control Release

Using the same watershed models used for the SMCRA permit applications, per Part II.A(3) of the NPDES permit, CMI demonstrated that implementation of the SCP has reduced annual sediment yields compared to the pre-mined, undisturbed conditions. While design specifications, construction specifications, and criteria for inspections are still provided in the permit-specific SCP (discussed above), MMD has removed the requirement for expected performance and maintaining sediment capacity at BMPs. A copy of this correspondence with MMD was provided in the 2014 annual Sediment Control Report.

Because MMD has removed performance and sediment capacity requirements, and the watersheds associated with each outfall have achieved Phase II bond release status, CMI did not conduct quarterly reclamation inspections during the reporting period. CMI will continue to comply with the annual Sediment Control Report condition of the NPDES permit to document that the facility has met the requirements.

Please contact me at (925) 842-3919 or Steve Linse at (307) 745-7474 (slinse@trihydro.com) with questions concerning this matter.

Sincerely,

Ian Robb
Project Manager
Chevron EMC

pdfc: Steve Linse, Trihydro
cc: Bruce Yurdin, NMED-SWQB

Attachment D

Permit NM0030180, Summary of Reported Excursion (Source: Excerpts from USEPA ICIS Database from reported data between 9/2014 thru 6/2017)

Permit Name	Version Nmbr	Curr. Major Minor Status	Issue Date	Effective Date	Expiration Date
CHEVRON MINING, INC.	0	Minor	7/29/2014	9/1/2014	8/31/2019

Outfall 004A

01104 Aluminum, total recoverable

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
9/1/2014	8/31/2019	GRAB	Monthly

Limit	
Limit Unit Desc	Milligrams per Lite
Statistical Base	DAILY MX
Limit Value	5.423
DMR Values	
6/30/15	29.7
7/31/15	33

Outfall 005A

01104 Aluminum, total recoverable

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
9/1/2014	8/31/2019	GRAB	Monthly

Limit	
Limit Unit Desc	Milligrams per Lite
Statistical Base	DAILY MX
Limit Value	5.423
DMR Values	
6/30/15	20.9
7/31/15	30

Outfall 006A

01104 Aluminum, total recoverable

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
9/1/2014	8/31/2019	GRAB	Monthly

Limit	
Limit Unit Desc	Milligrams per Lite
Statistical Base	DAILY MX
Limit Value	5.423
DMR Values	
6/30/15	34.1
7/31/15	37.2
8/31/15	13

Outfall 011A

01104 Aluminum, total recoverable

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
9/1/2014	8/31/2019	GRAB	Monthly

Limit	
Limit Unit Desc	Milligrams per Lite
Statistical Base	DAILY MX
Limit Value	5.423
DMR Values	
9/30/14	39
5/31/15	13.1
6/30/15	37
7/31/15	5.81
10/31/15	11
9/30/16	34

Outfall 012A

01104 Aluminum, total recoverable

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
9/1/2014	8/31/2019	GRAB	Monthly

Limit	
Limit Unit Desc	Milligrams per Lite
Statistical Base	DAILY MX
Limit Value	5.423
DMR Values	
6/30/15	45
7/31/15	42

Outfall 018A

01104 Aluminum, total recoverable

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
9/1/2014	8/31/2019	GRAB	Monthly

Limit	
Limit Unit Desc	Milligrams per Lite
Statistical Base	DAILY MX
Limit Value	5.423
DMR Values	
5/31/15	25
6/30/15	46.3
7/31/15	45.4
8/31/15	45.9
10/31/15	23
9/30/16	72

Outfall 022A

01104 Aluminum, total recoverable

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
9/1/2014	8/31/2019	GRAB	Monthly

Limit	
Limit Unit Desc	Milligrams per Lite

Statistical Base	DAILY MX
Limit Value	5.423
DMR Values	
9/30/14	**6.6**

Outfall 031A

01104 Aluminum, total recoverable

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
9/1/2014	8/31/2019	GRAB	Monthly

Limit	
Limit Unit Desc	Milligrams per Lite
Statistical Base	DAILY MX
Limit Value	5.423
DMR Values	
6/30/15	**18.5**
7/31/15	**8.91**
8/31/15	**14**

Outfall 032A

01104 Aluminum, total recoverable

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
9/1/2014	8/31/2019	GRAB	Monthly

Limit	
Limit Unit Desc	Milligrams per Lite
Statistical Base	DAILY MX
Limit Value	5.423
DMR Values	
6/30/17	**180**

Outfall 033A

01104 Aluminum, total recoverable

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
9/1/2014	8/31/2019	GRAB	Monthly

Limit	
Limit Unit Desc	Milligrams per Lite
Statistical Base	DAILY MX
Limit Value	5.423
DMR Values	
5/31/15	**10**